

EXHIBIT B

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

CAMILO SANDOVAL,
ON BEHALF OF HIMSELF AND ALL OTHERS
SIMILIARLY SITUATED,

INDEX NO.
FILING DATE: 11/12/18

Plaintiff,

SUMMONS
WITH NOTICE

-against-

WILLIAMS & FUDGE, INC.
AND STUDENT LOAN SOLUTIONS, LLC,

Plaintiff designates
New York County
as the place of trial

Defendants.

The basis of the venue is
Plaintiff's residence

To the above named Defendant(s):

You are hereby summoned to answer the complaint in this action and to serve a copy of your answer, or if the complaint is not served with the summons, to serve a notice of appearance, on the plaintiff's attorney within 20 days after the service of this summons, exclusive of the day of service (or within 30 days after the service is complete if the summons is not personally delivered to you within the State of New York); and in case of your failure to appear or answer, judgment will be taken against you by default for the sum of \$1,000 as regards Plaintiff individually and \$500,000.00 to be distributed among the class members in any certified class with interest thereon from the 12th day of November 2017, together with the costs of this action and attorney's fees.

TAKE NOTICE that the object of this action and the relief sought is to recover damages for violations of 15 USC 1692, et. seq. based on Exhibit A and that in case of your failure to answer, judgment will be taken against you for the sum of \$1,000 as regards Plaintiff individually and \$500,000.00 to be distributed among the class members in any certified class with interest thereon from the 12th day of November 2017, together with the costs of this action and attorney's fees.

NYSCEF DOC. NO. 1

RECEIVED NYSCEF: 11/12/2018

Dated: November 12, 2018

/s/ _____
Mitchell L. Pashkin
Attorney For Plaintiff
775 Park Avenue, Ste., 255
Huntington, NY 11743
(631) 335-1107

Index No.

CAMILO SANDOVAL,
ON BEHALF OF HIMSELF AND ALL OTHERS
SIMILIARLY SITUATED,

Plaintiff(s) ,

-vs-

WILLIAMS & FUDGE, INC.
AND STUDENT LOAN SOLUTIONS, LLC,

Defendant(s) .

SUMMONS WITH NOTICE

Mitchell L. Pashkin certifies that, to the best of his knowledge, information and belief, formed after an inquiry reasonable under the circumstances, the presentation of the annexed paper(s) or the contentions therein are not frivolous as defined in 22 NYCRR 130-1.1.(c).

/s/

Mitchell L. Pashkin
Attorney For Plaintiff(s)
775 Park Avenue, Ste., 255
Huntington, NY 11743
(631) 335-1107

Consumer Information

Williams & Fudge, Inc. Consumer ID #	2631644
Williams & Fudge, Inc. Pin #	1058
Amount Due for Accounts Listed Below	\$32,357.67

WILLIAMS & FUDGE, INC.

300 Chatham Ave., P.O. Box 1590
 Rock Hill, SC 29731-1590
 1-803-329-9791 1-800-551-8772
 TTY: 1-866-220-2920

November 12, 2017

Account(s) Details

Creditor	Account #	Amount Owed
STUDENT LOAN SOLUTIONS, LLC	SL732435935	\$32,357.67 \$32,357.67

Student Loan Solutions, LLC purchased the above referenced account(s) from Bank of America, NA on October 31, 2017.

We were hired by Student Loan Solutions, LLC to collect the amount owed.

In order to clear the outstanding account(s), you may contact the undersigned, or send the balance due to the above-referenced office address. If your account(s) is currently in repayment, your payment schedule will remain intact and your obligation will continue to be satisfied as previously agreed.

Unless you notify this office within 30 days after receiving this notice that you dispute the validity of the debt or any portion thereof, this office will assume this debt is valid. If you notify this office in writing within 30 days from receiving this notice, that you dispute the validity of the debt or any portion thereof, this office will obtain verification of the debt or obtain a copy of a judgment and mail you a copy of such judgment or verification. Upon your written request within 30 days after receipt of this notice, this office will provide you with the name and address of the original creditor, if different from the current creditor.

Student Loan Solutions, LLC may request this account(s) be reported to a National Credit Reporting Agency within 60 days from the date of this letter. Only debts within seven (7) years of the date of delinquency are reported to a National Credit Reporting Agency.

Williams & Fudge, Inc.

L. Jones

803-366-1664

Ljones@wfeorp.Com

This communication is from a debt collector and is an attempt to collect a debt. Any information obtained will be used for that purpose.

New York City Department of Consumer Affairs License Number: 1074538

Debt collectors, in accordance with the Fair Debt Collection Practices Act, 15 U.S.C. § 1692 et seq., are prohibited from engaging in abusive, deceptive, and unfair debt collection efforts, including but not limited to: a) the use or threat of violence; b) the use of obscene or profane language; and c) repeated phone calls made with the intent to annoy, abuse, or harass.

If a creditor or debt collector receives a money judgment against you in court, state and federal laws may prevent the following types of income from being taken to pay the debt:

1. Supplemental security income, (SSI); 2. Social security; 3. Public assistance (welfare); 4. Spousal support, maintenance (alimony) or child support; 5. Unemployment benefits; 6. Disability benefits; 7. Workers' compensation benefits; 8. Public or private pensions; 9. Veterans' benefits; 10. Federal student loans, federal student grants, and federal work study funds; and 11. Ninety percent of your wages or salary earned in the last sixty days.



NYSCEF - New York County Supreme Court

Confirmation Notice



This is an automated response for Supreme Court cases. The NYSCEF site has received your electronically filed documents for the following case.

160487/2018

CAMILO SANDOVAL v. WILLIAMS & FUDGE, INC. et al

Assigned Judge: None Recorded

Documents Received on 11/12/2018 12:00 PM

Doc #	Document Type	Motion #
1	SUMMONS WITH NOTICE Does not contain an SSN or CPI as defined in 202.5(e) or 206.5(e)	
2	EXHIBIT(S) A Does not contain an SSN or CPI as defined in 202.5(e) or 206.5(e)	

Filing User

Name:	Mitchell L Pashkin	E-mail Address:	mpash@verizon.net
Phone #:	631-335-1107	Work Address:	775 Park Avenue Ste. 255 Huntington, NY 11743
Fax #:	631-824-9328		

E-mail Notifications

An e-mail notification regarding this filing has been sent to the following address(es) on 11/12/2018 12:00 PM:

PASHKIN, MITCHELL L - mpash@verizon.net

NOTE: If submitting a working copy of this filing to the court, you must include as a notification page firmly affixed thereto a copy of this Confirmation Notice.

Hon. Milton A. Tingling, New York County Clerk and Clerk of the Supreme Court
Phone: 646-386-5956 Website: http://www.nycourts.gov/courts/1jd/supctmanh/county_clerk_operations.shtml

NYSCEF Resource Center - EFile@nycourts.gov
Phone: (646) 386-3033 Fax: (212) 401-9146 Website: www.nycourts.gov/efile

NYSCEF DOC. NO. 4

RECEIVED NYSCEF: 03/11/2019

Attorney(s) Law Office of Mitchell L. Pashkin

Index # 160487/18

Purchased/Filed: November 12, 2018

State of New York

Court: Supreme

County: New York

AFFIDAVIT OF SERVICE - SECRETARY OF STATE

Camilo Sandoval on behalf of himself and all others similarly situated

against

Williams & Fudge Inc., et al

Defendant

STATE OF NEW YORK)
COUNTY OF ALBANY) SS
CITY OF ALBANY)

DESCRIPTION OF PERSON SERVED:

Approx. Age: 55 Yrs.

Weight: 120 Lbs. Height: 5' 0" Sex: Female Color of skin: White

Hair color: Blonde Other:

Robert Guyette, being duly sworn, deposes and says: deponent is over the age of eighteen (18) years; is not a party to this action, and resides in the State of NY, and that on March 5, 2019, at 12:44 PM, at the office of the Secretary of State of the State of NY, located at 99 Washington Ave, 6th Fl, Albany, New York 12231 deponent served: Summons with Notice & Notice of Electronic Filing

on

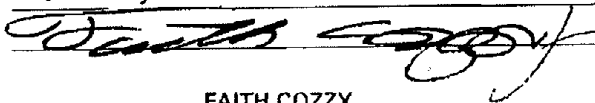
Williams & Fudge Inc.

the Defendant in this action, by delivering to and leaving with Sue Zouky AUTHORIZED AGENT in the Office of the Secretary of State, of the State of New York, personally at the Office of the Secretary of State of the State of New York, two (2) true copies thereof and that at the time of making such service, deponent paid said Secretary of State a fee of \$40 dollars; That said service was made pursuant to Section BUSINESS CORPORATION LAW §306.

Deponent further says that deponent knew the person so served as aforesaid to be the agent in the Office of the Secretary of State of the State of New York, duly authorized to accept such service on behalf of said defendant.

Sworn to before me on this

5th day of March 2019



FAITH COZZY
Notary Public, State of New York
No. 01CO61588/4
Qualified in Albany County
Commission Expires Jan. 8, 2023



Robert Guyette

Invoice-Work Order # 1909291
Attorney File # Sandoval

NYSCEF DOC. NO. 3

RECEIVED NYSCEF: 03/11/2019

Attorney(s) Law Office of Mitchell L. Pashkin

Index # 160487/18

Purchased/Filed: November 12, 2018

State of New York

Court: Supreme

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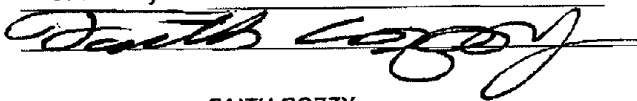
Student Loan Solutions, LLC

the Defendant in this action, by delivering to and leaving with Sue Zouky, AUTHORIZED AGENT in the Office of the Secretary of State, of the State of New York, personally at the Office of the Secretary of State of the State of New York, two (2) true copies thereof and that at the time of making such service, deponent paid said Secretary of State a fee of \$40 dollars; That said service was made pursuant to Section LIMITED LIABILITY COMPANY LAW §303.

Deponent further says that deponent knew the person so served as aforesaid to be the agent in the Office of the Secretary of State of the State of New York, duly authorized to accept such service on behalf of said defendant.

Sworn to before me on this

5th day of March 2019



FAITH COZZY
Notary Public, State of New York
No. 01C06158874
Qualified in Albany County
Commission Expires Jan. 8, 2023



Robert Guyette

Invoice-Work Order # 1909295
Attorney File # Sandoval



NYSCEF - New York County Supreme Court

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160487/2018

CAMILO SANDOVAL v. WILLIAMS & FUDGE, INC. et al

Assigned Judge: None Recorded

Documents Received on 03/11/2019 07:12 PM

Doc #	Document Type	Motion #
3	AFFIRMATION/AFFIDAVIT OF SERVICE Does not contain an SSN or CPI as defined in 202.5(e) or 206.5(e)	
4	AFFIRMATION/AFFIDAVIT OF SERVICE Does not contain an SSN or CPI as defined in 202.5(e) or 206.5(e)	

Filing User

Name:	Mitchell L Pashkin	E-mail Address:	mpash@verizon.net
Phone #:	631-335-1107	Work Address:	775 Park Avenue
Fax #:	631-824-9328		Ste. 255
			Huntington, NY 11743

E-mail Notifications

An e-mail notification regarding this filing has been sent to the following address(es) on 03/11/2019 07:12 PM:

PASHKIN, MITCHELL L - mpash@verizon.net

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Hon. Milton A. Tingling, New York County Clerk and Clerk of the Supreme Court

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NYSCEF Resource Center - EFile@nycourts.gov

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NYSCEF

New York County Supreme Court

Document List

Index # 160487/2018

Created on:04/03/2019 02:17 PM

Case Caption: CAMILO SANDOVAL v. WILLIAMS & FUDGE, INC. et al

Judge Name:

Doc#	Document Type/Information	Status	Date Received	Filed By
1	SUMMONS WITH NOTICE	Processed	11/12/2018	Pashkin, M.
2	EXHIBIT(S) Collection Letter	Processed	11/12/2018	Pashkin, M.
3	AFFIRMATION/AFFIDAVIT OF SERVICE	Processed	03/11/2019	Pashkin, M.
4	AFFIRMATION/AFFIDAVIT OF SERVICE	Processed	03/11/2019	Pashkin, M.